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March 30, 2020

**BY ELECTRONIC CASE FILING**

Honorable A. Kathleen Tomlinson  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722-9014

**Re: *McCune v. County of Suffolk, et al.***  
**Docket No.: 2:14-CV-04431 (JS)(AKT)**

Dear Judge Tomlinson:

As you are aware, we are the attorneys representing the Plaintiff in the above referenced matter. We write in response to Defendants' letter of this date, regarding Plaintiff's March 29, 2020 submission of what was hoped to be a Joint Status Report. Ms. Zwilling is correct that our letter was not a joint letter. We apologize to the Court and defense counsel, Ms. Zwilling, as it was my mistaken belief that the report was to have been filed on yesterday, March 29, 2020 and I was trying to insure the Court got information on what was believed to be the deadline.

In their report, Defendants state that the information provided to the Court is inaccurate. To the contrary, at the time Plaintiff submitted the letter, Plaintiff was not in receipt of Defendants' supplement responses to Plaintiff's interrogatories. In fact, those were sent to us today. Now that the requested interrogatory responses have been provided today via electronic mail, and have been reviewed, it has been determined that said responses are substantially compliant with the requests made. We are currently reviewing documents provided to evaluate if they are fully responsive to the requests made.

We thank the Court for its kind consideration and this opportunity to clarify our position.

Respectfully Submitted,  
*/s/ Frederick K. Brewington*  
FREDERICK K. BREWINGTON

cc: Arlene Zwilling, Esq. (By ECF)  
FKB:pl